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METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

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JUN 17 1997

WATER SUPPLY IMPROVEMENTS

Office of the General Manager

June 16, 1997

Mr. Kurt Ladensack
East Bay Municipal Utility District
P.O. Box 24055, MS 305
Oakland, California 94623-1055

Mr. Cecil Lesley
United States Bureau of Reclamation
7794 Folsom Dam Road
Folsom, California 95630

Dear Mr. Ladensack and Ms. Lesley:

Revised Notice of Preparation and Notice of Intent for the
EBMUD's Supplemental Water Supply Project
Joint Environmental Impact Report/ Environmental Impact Statement

We have received the Revised Notice of Preparation and Notice of Intent (NOP/NOI) for a Joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for East Bay Municipal Utility District's (EBMUD) Supplemental Water Supply Project. EBMUD is proposing to develop facilities that will enable them to receive delivery of American River water under its Central Valley Project (CVP) contract with the United States Bureau of Reclamation (USBR).

The NOP/NOI identifies five alternatives for diversion and conveyance of CVP water. One of the alternatives is a joint project between EBMUD, the City of Sacramento, and the County of Sacramento in a regional partnership to meet water supply needs. However, the NOP/NOI does not identify an alternative that combines EBMUD facilities with components of a much broader regional partnership, the CALFED Bay-Delta Program, which is currently proceeding with an EIR/EIS process. EBMUD's EIR/EIS should include such an alternative because of the potential for minimizing cumulative environmental impacts.

CALFED, a consortium of state and federal agencies, including USBR, is currently involved in a multi-phased program aimed at achieving improvements to the ecosystem, water quality, water supply reliability, and system vulnerability problems in the Delta. CALFED identified an isolated facility as a part of the Dual Delta Conveyance alternative during its Phase 1 process. An isolated facility would serve as an alternative Central Valley Project (CVP)/State Water Project (SWP) diversion point to divert high quality water from the Sacramento River near Hood (or Freeport) and to interconnect with existing CVP and SWP facilities in the southern Delta.

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-2-

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An opportunity exists to maximize the benefits of both EBMUD facilities and those being considered in the CALFED process. This could be accomplished by combining the point of diversion for EBMUD's facilities with a Delta conveyance facility. Accordingly, the EIR/EIS should analyze an alternative that would have the diversion point for an isolated facility at Hood or Freeport serving as a consolidated point of diversion for EBMUD's CVP supplies. Such an alternative would provide EBMUD with its necessary supplemental water supplies while minimizing potential ecosystem impacts as well as potential impacts on downstream beneficial uses of Delta water.

In addition to broadening the alternative analysis, the geographical area of impact and benefit analysis needs to be expanded. The focus of the impact and benefits analysis appears to be on the Lower American River and Folsom South Canal Connection. However, diversions from the American River combined with USBR's operation of Folsom Reservoir could impact the ecosystem in the Delta and the operations of downstream water diversions, including diversions within and from the Delta. Accordingly, the study area identified in the NOP/NOI should be expanded to also analyze each alternative's potential impacts and benefits on the Delta as well as downstream water users.

Conclusion

We appreciate the opportunity to provide input to your planning process. If we can be of further assistance, please contact Mr. Stephen Arakawa at (213) 217-6052 regarding Bay/Delta matters, or Dr. Roy Wolfe at (213) 217-6241 regarding water quality concerns.

Very truly yours,



Laura Simonek
Principal Environmental Specialist

KAD/cl

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Mr. Ladensack
Mr. Cecil Lesley

-3-

June 16, 1997

cc: Mr. Lester Snow
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